

1 **Michael J. Aye, SBN 86288**  
Attorney at Law  
2 117 J Street, Suite 202  
Sacramento, CA 95814-2212  
3 Telephone (916) 447-1278

4  
5 ATTORNEY FOR DEFENDANT  
Joshua Klipp

6  
7 IN THE UNITED STATES DISTRICT COURT FOR THE  
8 EASTERN DISTRICT OF CALIFORNIA  
9

10  
11 UNITED STATES OF AMERICA, ) 2:14-cr-00107-TLN-1  
 )  
12 PLAINTIFF, ) STIPULATION AND ORDER  
 ) COUNTIUNG STATUS  
13 v. ) CONFRENCE FROM JULY 31, 2014  
 ) TO SEPTEMBER 4, 2014  
14 JOSHUA KLIPP, )  
 )  
15 )  
 )  
16 DEFENDANT. )  
 )

17 **STIPULATION**

18  
19 Plaintiff United States of America, by and through its  
20 counsel of record, and defendant, by and through his counsel of  
21 record, hereby stipulate as follows:

22 1. By previous order, this matter was set for status on  
23 July 31, 2014.  
24

25 2. By this stipulation, the parties now moves to continue  
26 the status conference until September 4, 2014, at 9:30 a.m., and  
27  
28

1 to exclude time between July 31, 2014, and September 4, 2014  
2 under Local Code T4.

3 3. The parties agree and stipulate, and request that the Court  
4 find the following:  
5

6 a. The government has represented that the discovery  
7 associated with this case includes a significant amount of  
8 electronic evidence. This discovery has been provided, or  
9 will be made available to the defense for review.  
10

11 b. Counsel for the defendant has retained an expert to  
12 review the electronic evidence in this matter but the  
13 expert has yet to actually viewed the material and provided  
14 a report to counsel. Counsel for defendant believes that  
15 failure to grant the above-requested continuance would deny  
16 him the reasonable time necessary for effective  
17 preparation, taking into account the exercise of due  
18 diligence.  
19

20 c. The government does not object to the continuance.

21 d. Based on the above-stated facts, the ends of justice  
22 served by continuing the case as requested outweigh the  
23 interest of the public and the defendant in a trial within  
24 the original date prescribed by the Speedy Trial Act.  
25

26 e. For the purpose of computing time under the Speedy Trial  
27 Act, 18 U.S.C. § 3161, et seq., the time period of July 31,  
28

1 2014 to September 4, 2014, inclusive, is deemed excludable  
2 pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), Local Code  
3 T4, because it results from a continuance granted by the  
4 Court at defendant's request on the basis of the Court's  
5 finding that the ends of justice served by taking such  
6 action outweigh the best interest of the public and the  
7 defendant in a speedy trial.  
8

9 4. Nothing in this stipulation and order shall preclude a  
10 finding that other provisions of the Speedy Trial Act dictate  
11 that additional time periods are excludable from the period  
12 within which a trial must commence.  
13

14 .  
15  
16 Dated: 7/24/2014

17 \_\_\_\_\_/S/ Michael J. Aye\_\_\_\_\_  
18 Michael J. Aye, Attorney for  
19 Defendant, Aleksander Randjelovich

20 Date: 7/24/2014

21 \_\_\_\_\_/S/ Kyle Reardon\_\_\_\_\_  
22 Kyle Reardon, AUSA, Attorney for  
23 Plaintiff, United States of America  
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IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	2:14-cr-00107-TLN-1
	)	
PLAINTIFF,	)	
	)	ORDER COUNTIUNG STATUS
v.	)	CONFERENCE FROM JULY 31, 2014
	)	TO SEPTEMBER 4, 2014
Joshua Klipp,	)	
	)	
	)	
DEFENDANT.	)	
	)	

The parties' stipulation is approved and so ordered. The time beginning July 31, 2014, until September 4, 2014, is excluded from the calculation of time under the Speedy Trial Act. For the reasons contained in the parties' stipulation, this exclusion is appropriate to ensure effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv); Local Code T4. The interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

Dated July 24, 2014



Troy L. Nunley  
United States District Judge